

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

In re POLYURETHANE FOAM ANTITRUST
LITIGATION

This document relates to:

DIRECT PURCHASER (CLASS) ACTION and
INDIRECT PURCHASER CLASS ACTION

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) MDL Docket No. 2196
) Index No. 10-MD-2196 (JZ)
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**STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINE FOR JOINT
DISCOVERY SUBMISSIONS ON INSTRUCTIONS NOT TO ANSWER AT PLAINTIFF
DEPOSITIONS**

WHEREAS, the Court requested during the August 5, 2013 telephonic hearing that the parties submit charts containing deposition excerpts showing Plaintiffs' counsels' objections to and/or instructions not to answer Defendants' counsel's questions at recent depositions, to the extent Defendants challenge these objections and/or instructions;

WHEREAS, the Court requested that these submissions include Plaintiffs' positions on their objections and/or instructions not to answer and Defendants' positions on why the testimony should be allowed, *see* 8/5/13 Hearing Tr. at 29:16-30:9 (Dkt. No. 662);

WHEREAS, the Court requested that these submissions be provided to the Court by August 12, 2013;

WHEREAS, the parties in good faith prepared the initial drafts of their respective portions of these submissions, but for unanticipated scheduling reasons the parties do not believe they will be able to provide their joint submissions to the Court by August 12, 2013;

IT IS HEREBY STIPULATED AND AGREED THAT:

1. The parties' joint discovery submissions on instructions not to answer at Plaintiff depositions shall be provided to the Court by Tuesday, August 13, 2013.

DATED: August 12, 2013

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SO ORDERED:

DATED: _____

HON. JACK ZOUHARY
UNITED STATES DISTRICT JUDGE